



COUNTY OF NASSAU
OFFICE OF THE COUNTY ATTORNEY

February 11, 2025

Via ECF

Honorable Gary R. Brown
United States District Court
100 Federal Plaza
Central Islip, New York 11722

Re: Frankie Valenti v. Ryder, et al. (19-CV-03990 (GRB)(LGD))

Your Honor:

This office represents Defendants in the above referenced action. The purpose of this letter is to respectfully request that due to the press of work resulting from severe staffing shortages in this office, that the Court approve a revised briefing schedule for the parties' renewed motion and cross-motion for summary judgment. This is defendants' third request for an extension.

The previously approved briefing schedule was:

January 31, 2025 – Defendants serve their motion upon plaintiff's attorney.

March 3, 2025 – Plaintiff serves his cross-motion together with opposition to defendants' motion.

March 24, 2025 – Defendants serve their opposition to plaintiff's cross-motion, together with their Reply Memorandum of Law in further support of their motion for summary judgment.

April 7, 2025 – Plaintiff serves his Reply Memorandum of Law in further support of his cross-motion.

April 11, 2025 – Defendants' will file the fully briefed cross-motions on ECF, and courtesy copies will be delivered to Chambers.

For the reasons stated above, Defendants now respectfully request that Your Honor approve the following revised briefing schedule:

March 7, 2025 – Defendants serve their motion upon plaintiff's attorney.

April 7, 2025 – Plaintiff serves his cross-motion together with opposition to defendants' motion.

May 9, 2025 – Defendants serve their opposition to plaintiff's cross-motion, together with their Reply Memorandum of Law in further support of their motion for summary judgment.

May 23, 2025 – Plaintiff serves his Reply Memorandum of Law in further support of his cross-motion;

On or before May 30, 2025– Defendants' will file the fully briefed cross-motions on ECF, and courtesy copies will be delivered to Chambers.

Plaintiff's counsel has informed me that plaintiff does not oppose defendants' request for Court approval of the foregoing revised briefing schedule but does not consent.

As always, the parties thank Your Honor for your attention and consideration in this matter.

Respectfully submitted,

/s/ Ralph J. Reissman
RALPH J. REISSMAN
Deputy County Attorney

cc: Harfenist Kraut & Perlstein, LLP
Attorneys for Plaintiff